

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GERALDINE LAUTURE	:	
	:	
Plaintiff	:	
	:	
v.	:	Civil Action No.: CCB-08-943
	:	
ST. AGNES HOSPITAL	:	
	:	
Defendant	:	
	:	

**PLAINTIFF'S RESPONSE IN OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Geraldine Lauture, (“Plaintiff” or “Lauture”), by and through undersigned attorney opposes Defendant’s motion for summary judgment and for cause states that Defendant’s motion be denied because Defendant is not entitled to summary judgment as matter of law.

Plaintiff has produced sufficient evidence from which a jury could reasonably find in Plaintiff’s favor on all counts of Plaintiff’s complaint against Defendant. As a result, there are genuine issues of material facts in dispute between the parties on each of Plaintiff’s claim precluding summary judgment in Defendant’s favor.

Plaintiff’s opposition to Defendant’s motion for summary judgment is supported by a Memorandum of Law attached herewith and incorporated herein by reference together with all matters of record in the case, including the pleadings, affidavit, excerpts from written and oral discovery responses and depositions, and a number of documents which have been produced in discovery by the parties herein.

WHEREFORE Plaintiff prays that Defendant’s Motion be denied in its entirety.

Respectfully submitted,

/s/

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Plaintiff's Attorney.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of May 2009, I filed via the Court's electronic filing system, the foregoing Plaintiff's Response in Opposition to Defendant's motion for summary judgment, supporting Memorandum and proposed Order. Notice of this filing will be performed by the Court's electronic filing system, and parties may access all documents through the electronic filing system.

/s/

Fatai A. Suleman, Esquire